IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

CAITLIN O'CONNOR,)
Plaintiff,) No. 3:20-cv-00628
v.) Judge Eli J. Richardson)
THE LAMPO GROUP, LLC a/k/a RAMSEY SOLUTIONS,)) Magistrate Judge Frensley) Jury Demand
Defendant.	<i>)</i>)

<u>UNOPPOSED MOTION TO EXTEND TIME TO RESPOND TO DEFENDANT'S</u> <u>MOTION FOR SUMAMRY JUDGMENT</u>

Plaintiff moves to extend the time to respond to Defendant's Motion for Summary Judgement from December 7, 2021, to December 17, 2021. (ECF 66, 67). Dispositive motions were due November 19, 2021. (ECF 48). Defendant filed a motion for summary judgment prior to the deadline on November 9, 2021. (ECF 66, 67). Accordingly, Plaintiff's response is currently due on December 7, 2021. Plaintiff's lead counsel is scheduled as lead counsel for a multi-day arbitration hearing that same week. Accordingly, Plaintiff moves to extend its time to respond to Defendant's motion for summary judgment to December 17, 2021, which would have been the date the Plaintiff's response would have been due had the motion been filed on November 19, 2021, the deadline that was set in the scheduling order. As such, no prejudice will result, nor will this extension affect the reply or trial deadlines. Plaintiff conferred with Defendant concerning this request and Defendant does not oppose the requested extension.

Respectfully submitted,

s/ Heather Moore Collins

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CERTIFICATE OF SERVICE

I HEREBY certify that a copy of the foregoing has been e-mailed on November 23, 2021 to counsel of record through the court's CM/ECF system:

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